

STATE OF NORTH CAROLINA  
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE  
FILED SUPERIOR COURT DIVISION  
CIVIL ACTION NO: 19-CVS-12904

XPO LOGISTICS, INC.,

Plaintiff,

v.

JESSICA NORTHROP,

Defendant.

2019 JUL 19 P 1:05

MECKLENBURG CO., C.S.C.

BY

AFFIDAVIT OF SATYRA L. RIGGINS

Satyra L. Riggins, being first duly sworn, deposed and says:

1. I am a litigation paralegal with Robinson, Bradshaw & Hinson, P.A. ("Robinson Bradshaw"), who serves as legal counsel to Plaintiff XPO Logistics, Inc. ("XPO") in this matter. The facts stated herein are from my personal knowledge.

2. I participated in a conference call with Defendant Jessica Northrop ("Ms. Northrop") and Robinson Bradshaw attorneys, Douglas M. Jarrell and Gabriel Wright, on Tuesday, July 2, 2019. The conference call started at approximately 11:15 a.m. and ended at 11:45 a.m. Ms. Northrop was aware that I was participating in the conference call.

3. Ms. Northrop stated that, at some point after she received Robinson Bradshaw's June 13, 2019 cease and desist letter, Saia changed her position from Terminal Manager for Saia's facility in Syracuse, New York to "Special Projects Manager" at its facility in Newburgh, New York. She explained that the other facilities in the district are Syracuse, Springfield, Massachusetts and West Boston, Massachusetts. All of these terminals were recently opened by Saia.

4. Ms. Northrop stated that her position as Special Projects Manager will involve assisting these new LTL terminals with "operational and office issues" in order to help get them

up and running. She agreed that her responsibilities would be similar to her duties as Services Center Manager for XPO, except that her position with Saia would involve newly-opened terminals. As she understood it, her position would require her to help facilities address operational problems as they arose.

5 Ms. Northrop also stated that there was no Terminal Manager at the Newburgh facility.

6. Ms. Northrop acknowledged that she emailed the XPO files to her personal account because she thought they would be helpful in her new job. She claimed they were corrupt and that she was unable to open them.

This 18<sup>th</sup> day of July, 2019.

Satya L. Riggins  
Satyra L. Riggins

Sworn to and subscribed  
before me, this 18<sup>th</sup> day of  
July, 2019.

Phyllis Ann Bess  
Notary Public Phyllis Ann Bess

My commission expires:

10/21/2019  
(Official Seal)



## CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon all counsel of record by email and first-class mail, postage prepaid as follows:

Craig L. Leis ([craig@gibbonsleis.com](mailto:craig@gibbonsleis.com))  
Gibbons Leis PLLC  
14045 Ballantyne Corporate Place, Suite 325  
Charlotte, NC 28277

This 18th day of July, 2019.



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Douglas M. Jarrell